

**Chicago
Hearing
Society**

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CHICAGO HEARING SOCIETY

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Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: Comments on Docket Number 98-67

Dear Ms. Dortch,

I am writing to urge the FCC to change the rules regarding the provision of video relay interpreting services for depositions and other legal proceedings.

I believe that a conflict between FCC rules governing the provision of video relay services on the one hand and state statutes governing the provision of legal interpreters on the other jeopardizes legal protections for deaf consumers that these statutes were intended to create. Furthermore, this conflict creates the potential of exposure to civil and criminal liability to providers of video relay services and the interpreters themselves. I believe the continued handling of legal proceedings via video relay service calls is detrimental to both deaf parties and the video relay service providers.

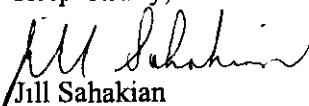
As the director of Chicago Hearing Society, I have overseen the operation of the largest interpreter referral service in Illinois for over 8 years. For any citizen who is participating in a legal proceeding, the first step in assuring justice is for all parties to be fully informed and to understand the proceedings in which they are participating. For a deaf consumer, this understanding depends on communication access which is provided via a sign language interpreter. The key to providing appropriate communication access in situations as important and often complicated as legal proceedings is proper preparation on the part of the interpreter. When the proceeding is handled by a video relay interpreter, there is no opportunity for preparation. This compromises the deaf consumer's access to justice.

In addition, it should be noted that legal proceedings, such as depositions, are seldom handled over the phone when hearing people are involved. Are not deaf consumers entitled to the same considerations?

Finally, some states have specific requirements regarding the qualifications, licensing and credentials of interpreters who provide legal interpreting services. Although the skill levels of video relay interpreters are very high, there is no way to ascertain that these special requirements are satisfied when video relay services are used.

I urge the FCC to reconsider its rules and to discontinue the provision of legal interpreting via video relay service.

Respectfully,


Jill Sahakian
Director, Chicago Hearing Society

cc: Tom Chandler

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